

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

**DEBORAH ANN COLLINS, individually §
and on behalf of all others similarly §
situated, §
Plaintiff, §**

v. §

**FALAYA, LLC, §
Defendant. §**

C.A. NO. 4:25-cv-00088-SDJ

AFFIDAVIT OF BARRET BLONDEAU

**STATE OF LOUISIANA §
§
PARISH OF EAST BATON ROUGE §**


Before me, the undersigned authority, personally came and appeared Barret Blondeau, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

1. My name is Barret Blondeau. I am over 18 years of age, of sound mind, and am capable of and authorized to make this affidavit on behalf of Defendant Falaya, LLC. The facts stated in this affidavit are within my personal knowledge, and are true and correct.
2. I am the Founder and CEO of Falaya, LLC.
3. I have read the factual allegations contained in Defendant Falaya, LLC's Motion to Dismiss and, in the Alternative, Original Answer and Affirmative Defenses to Plaintiff Deborah Ann Collins' Original Complaint, and those factual allegations are true and correct and within my personal knowledge.
4. Falaya, LLC is organized under the laws of Louisiana, is a citizen of Louisiana, and has its principal place of business in Louisiana. None of Falaya, LLC's officers, members, or directors reside in Texas.
5. It is believed that Plaintiff is, and was at the time of the subject incident, a resident of the State of Florida.

PD.48946009.1

EX. A

Further affiant sayeth not.


Barret Blondeau

Sworn to and subscribed before me on this 3rd day of April, 2025.


Notary Public for the State of Louisiana

My commission expires: "for life"

